Hazardous Waste Incinerator Trial Burn Plan Evaluation

RCRA RECORDS CENTER FACILITY Prott & Whythrey - Mains I.D. NOCTD99007/01 FILE LOC. R-113 OTHER Roms # 2499

Applicant Pratt & Whitney Aircraft E, Hartford, CT Location POHC(s) Connent. Number No X Has selection of POHC(s) been approved by WMD? Yes ____ Has (have) POHC(s) been adequately identified? 2. Tes No X a. chemical composition description adequate. No X b. heating value. c. viscosity. No K No X Yes d. concentration. Incinerator Description Yes X Manufacturer's name and model number. No Mo____ Yes X Type of incinerator. Yes X No Description of operation. 4. Procedures for; No Z a. start-up. Yes___ Yes No b. shut-down, Yes____No_X c. emergency shut-down. 5. Linear dimensions including cross sectional area Yes_X No of combustion chamber. Yan Description of auxiliary fuel system (type/feed). 119____ Y. Descripcion and capacity of prime moves. No___ 8. Description of automatic waste feed out-off X et al. No ____ ේ වෙන්වෙන් ඉඳුම Yas i ko 9. Nonale and burner design. Yes X No

10. Material(s) of constauction.

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11.	Location and description of devices for m	easuring;			Comment Number
	a. temperature,	Ye	s X	No	
	b. pressure,	Ye	sX	No	
	c. feed rate(s),	Ye	8 X	No	
	d. combustion gas velocity,	Ye	8	No_X	
	e. carbon monoxide,	Ye	s X	No	2
	f. diagram indication location of above.	Ye	8	No_X	
Pol	lution Control Equipment				
1.	Manufacturer's name(s) and model number(s). Y	'es	No_X	3
2.	Type of control device(s) and description operation.		es_X	No	
3.	Linear dimensions including cross section of stack.		es_X	No	
4.	Material(s) of construction.	Y	es_X	No	
5.	Location and description of devices for measuring;				
	a. temperature,	7	es_X	No	
	b. pressure differential,	Y	es	No_X	4
	c. scrubbing medium injection rate,	3	es	No_X	
	d. scrubbing medium injection pressure,e. scrubbing medium pH,		es	No_X	·
			es	No_X	5
	f. diagram indicating location of above.	Y	es	No_X	
San	pling Procedures				
1.	Particulate				
	a. detailed sampling procedures.	Adequate	Inadequ	sateX	6
	b. detailed QA procedures.	Adequate	Inadequ	ateX	6
2.	HCL				
	a. detailed sampling procedures.	Adequate	Inadequ	uateX	6
	b. detailed QA procedures.	Adequate	Inadequ	uateX	6

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POHC DRE			Comment Number
a. detailed sampling procedures.	Adequate	Inadequate X	7
b. detailed QA procedures.	Adequate	Inadequate X	7
Scrubbing medium			
a. detailed sampling procedures.	Adequate	Inadequate X	8
b. detailed QA procedures.	Adequate	Inadequate X	8
Ash residues			
a. detailed sampling procedures.	Adequate	InadequateX	8
b. detailed QA procedures.	Adequate	Inadequate X	8
Waste Feed			
a. detailed sampling procedures.	Adequate X	Inadequate	
b. detailed QA procedures.	Adequate	Inadequate X	9
lysis Procedures			
Particulate			
a. detailed analytical procedures.	Adequate	Inadequate X	6
b. detailed QA procedures.	Adequate	InadequateX	6
HCL			
a. detailed analytical procedures.	Adequate	Inadequate X	66
b. detailed QA procedures.	Adequate	InadequateX	6
POHC DRE		,	
a. detailed analytical procedures.	Adequate	Inadequate X	7
b. detailed QA procedures.			
Scrubbing medium			
•	Adequate	Inadequate x	8
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	a. detailed sampling procedures. b. detailed OA procedures. Scrubbing medium a. detailed sampling procedures. b. detailed OA procedures. Ash residues a. detailed sampling procedures. b. detailed OA procedures. Waste Feed a. detailed sampling procedures. b. detailed OA procedures. lysis Procedures Particulate a. detailed analytical procedures. b. detailed OA procedures. HCL a. detailed analytical procedures. b. detailed OA procedures. POHC DRE a. detailed analytical procedures. b. detailed OA procedures.	a. detailed sampling procedures. b. detailed OA procedures. Scrubbing medium a. detailed sampling procedures. Adequate b. detailed OA procedures. Adequate Ash residues a. detailed sampling procedures. b. detailed OA procedures. Adequate Waste Feed a. detailed sampling procedures. b. detailed OA procedures. Adequate X Adequate X Adequate X Adequate Adequate Adequate Butter in the sampling procedures and in the sampling procedures. Adequate Adequate Adequate Adequate Butter in the sampling procedures and in the sampling procedures. Adequate Adequate Butter in the sampling procedures and in the sampling procedures. Adequate Adequate Butter in the sampling procedures and in the sampling procedures. Adequate Butter in the sampling procedures and in the sampling procedures. Adequate Butter in the sampling procedures and in the sampling procedures. Adequate Butter in the sampling procedures and in the sampling procedures. Adequate Adequate Butter in the sampling procedure and in the sampling procedures. Adequate Adequate	a. detailed sampling procedures. b. detailed OA procedures. Adequate Inadequate X Scrubbing medium a. detailed sampling procedures. b. detailed OA procedures. Adequate Inadequate X Ash residues a. detailed sampling procedures. Adequate Inadequate X Ash residues a. detailed OA procedures. Adequate Inadequate X B. detailed OA procedures. Adequate Inadequate X B. detailed analytical procedures. B. detailed OA procedures. BCL a. detailed analytical procedures. Adequate Inadequate X B. detailed OA procedures. Adequate Inadequate X Adequate Inadequate X B. detailed OA procedures. Adequate Inadequate X Adequate Inadequate X B. detailed OA procedures. Adequate Inadequate X B. detailed OA procedures. Adequate Inadequate X Adequate Inadequate Inadequate X Adequate Inadequate Inadequate X Adequate Inadequate Inadequate Inadequate X Adequate Inadequate Inadeq

5.	Ash residues a. detailed analytical procedures.	Adequate	Inadequat	e <u>x</u>	Comment Number 8
	b. detailed QA procedures.	Adequate	Inadequat	e <u> X</u>	8
6.	Waste Feed				
	a. detailed analytical procedures.	Adequate	Inadequat	eX	10
	b. detailed QA procedures.	Adequate	Inadequat	eX	10
Ant	icipated Incinerator and Control Equipme	nt Operation Con	ditions (f	or each	POHC)
1.	Feed description.	Ye	s N	oX	11
2.	Feed rate.	Ye	s X N	o	
3.	Auxiliary fuel feed rate.	Ye	s N	oX	
4.	Incineration temperature range.	Ye	s X N	o	
5.	Scrubber parameters.	Ye	s N	oX	12
6.	Carbon monoxide emissions.	Ye	s <u> </u>	o	
7.	Combustion gas velocity.	Ye	s_X N	o	-

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Some of this information is contained in the submittal, although not specifically required by the regulation. I feel that it would be beneficial to have P&W submit an incinerator/emissions control system operations and maintenance manual which would contain a detailed description of procedures (including operational parameter ranges) the operator must follow for:

- a. start-up (cold),
- b. shut-down,
- c. emergency shut-down,
- d. automatic shut-down,
- e. re-starting (warm),
- f. normal operations.

The manual should also include a plan for conducting "normal" maintenance procedures and periodic maintenance inspections of both systems (including monitoring devices). Changes to the manual should be reported to EPA/CT DEP. Operating records, maintenance records, and inspection records should be retained by P&W for a minimum of two years and should be made available at the request of EPA/CT DEP.

- 2. P&W has provided very little inforamtion concerning their CO CEM system.

 This system must successfuly complete a performance specification test (PST) prior to the conduct of the trial burn. P&W should contact ESD for details of pretest report, pretest conference, and PST procedural requirements. A separate O&M manual for this system is desirable.
- 3. | Model numbers not mentioned.
- 4. Pressure differential is measured across the Venturi but apparently not across the packed tower/demister. All require continuous measurement.
- 5. A more detailed explanation of the serfilco pH controller/monitor is desirable.
- 6. P&W has indicated that the proper procedures will be used; however, a detailed testing protocol (pretest report) must be submitted for review. P&W should contact ESD for details concerning pretest report requirements. Also, a pretest conference will be required at least 10 days in advance of the test date. The conference should be held at P&W and should be attended by appropriate personnel from P&W, P&W's testing contractor, EPA and CT DEP.

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- 7. P&W has made no mention of POHC testing. A detailed sampling and analysis plan must be submitted for review. (ESD can supply information concerning POHC sampling and analysis using the VOST method.) However, the POHC(s) should be chosen prior to submittal of this plan.
- A detailed sampling and analysis plan must be submitted.
- 9. P&W has made no mention of sample handling/chain-of-custody procedures to be used.
- 10. A detailed analysis plan must be submitted.
- 11. POHC(s) not yet chosen.
- 12. | See Pollution Control Equipment items 5.a) 5.e) and comments 4 and 5.

Bill Torrey Action Approval Approval As Requested For Correction Circulate For Your Information File For Your Information File For Your Information Frepare Reply Coordination Justify EMARKS A Lie'r a decent corry A Correction Frepare Reply For Your Information For Your Information File For Your Information Frepare Reply For Your Information For Your Informatio	ROUTING AND T	RANSMITTAL SLIP	Date	8/0	29
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